

Exhibit A

Minga, Jay

From: Forman, Daniel <DForman@willkie.com>
Sent: Tuesday, June 25, 2019 3:06 PM
To: Minga, Jay
Cc: Goren, Matthew; McCallen, Benjamin; Fleming, Timothy; Liou, Jessica; Slack, Richard
Subject: Re: PG&E Protective Order

Rick- Per our conversation, below is the list of individual members' subrogation and bankruptcy counsel. We listed lead counsel for each firm, but understand that each is working with their full complement of associates, legal assistants, etc. at their respective firms. Please confirm you have no objection to the following receiving confidential and highly confidential discovery material. We will advise as (and if) additional counsel for individual members require access to material, and expect any such additional counsel receive the same consideration from the company in the future.

Thank you

<u>Subrogation Counsel</u>	
Alper & McCulloch	Dean Alper
Bauman Loewe Witt & Maxwell, PLLC	Scott Loewe; Mark Bauman
Berger Kahn	Craig Simon
Cozen O'Connor P.C.	Howard Maycon; Kevin Bush; Mark Felger
Denenberg Tuffley, PLLC	Paul Casetta; Alan McMaster
Gibson Robb & Lindh LLP	Joshua E. Kirsch
Greer, Herz, & Adams, LLP	David Booth
Grotefeld Hoffmann Gordon Ochoa & Evinger, LLP	Mark Grotefeld; Maura Walsh-Ochoa; Waylon Pickett
Jang & Associates LLP	Alan Jang
Law Offices of Shawn E. Caine, A.P.C.	Shawn Caine
Mazzola Lindstrom LLP	Wendy Lindstrom; Hanoch Sheps
Nielsen Zehe & Antas, PC	Jack McCabe; Brian T. Suth
Noma Law	Sally Noma
Prager Dreifuss	Gion Christian Casanova
Robins Kaplan LLP	Scott G. Johnson
Schroeder Loscutoff LLP	Eric Schroeder; Bill Loscutoff
Shoecraft Burton, LLP	Michelle Burton; Rachel Kelly
Sloane and Walsh, LLP	John A. Donovan III; Anthony J. Antonellis
Soltman, Levitt, Flaherty, & Wattles LLP	Steven B. Soltman; Steven S. Nimoy
Stutman Law	Tim Cary; Nathan Hurd

<u>Bankruptcy Counsel</u>	
Dentons	Peter Wolfson; Patrick Maxcy
Friedman Kaplan	Eric Seiler; Jason Rubinstein
Gibson Dunn	Jeffrey C. Krause; James Hallowell
Locke Lord LLP	Aaron Smith
Pachulski Stang Ziehl & Jones	Isaac Pachulski; Debra Grassgreen
Vinson & Elkins	Mortimer Hartwell; Meghan Natenson

Daniel Forman

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On Jun 25, 2019, at 11:25 AM, Forman, Daniel <DForman@willkie.com> wrote:

Following up on my email below, we read your reply, and we're hoping we can talk briefly. I'm flying to California today, but can talk any time before 1:15 Eastern.

Thanks,

Dan

Daniel Forman

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From: Forman, Daniel

Sent: Monday, June 24, 2019 12:17 PM

To: 'Minga, Jay' <Jay.Minga@weil.com>

Cc: Goren, Matthew <matthew.goren@weil.com>; McCallen, Benjamin <BMcCallen@willkie.com>;

Fleming, Timothy <TFleming@willkie.com>; Liou, Jessica <jessica.liou@weil.com>; Slack, Richard

<richard.slack@weil.com>

Subject: RE: PG&E Protective Order

Weil team –

In follow up to our call last week – the two categories of attorneys we would like to share discovery with are individual group members' subrogation and bankruptcy counsel, all of whom are actively engaged in advising our group members with respect to this bankruptcy case. Would you consent now that those parties can sign the acknowledgment and gain access to discovery per section 7.3(k) of your proposed protective order? If you consent, we can take that issue off the table for Wednesday's hearing.

Thank you,

Dan

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From: Forman, Daniel
Sent: Sunday, June 23, 2019 1:30 PM
To: 'Minga, Jay' <Jay.Minga@weil.com>
Cc: Goren, Matthew <matthew.goren@weil.com>; McCallen, Benjamin <BMcCallen@willkie.com>; Fleming, Timothy <TFleming@willkie.com>; Liou, Jessica <jessica.liou@weil.com>; Slack, Richard <richard.slack@weil.com>
Subject: RE: PG&E Protective Order

Thanks, of course when the language was in the TCC's draft, it was in the context of a protective order that contemplated the designating party filing a motion to defend a designation, and the provision in question read: "**In addition**, the Challenging Party may file a motion challenging a confidentiality designation at any time if there is good cause for doing so . . ." In my view the same language is very different within context. In the TCC's version it was an option above and beyond the designating party's obligation to go to court. In your version it is the challenging party's sole recourse. I urge you to re-consider whether "if there is good cause for doing so" is truly necessary when the challenging party is the one that has to bring the motion in the first instance. We also continue to think about the issue on our side.

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From: Minga, Jay [<mailto:Jay.Minga@weil.com>]
Sent: Friday, June 21, 2019 7:00 PM
To: Forman, Daniel <DForman@willkie.com>
Cc: Goren, Matthew <matthew.goren@weil.com>; McCallen, Benjamin <BMcCallen@willkie.com>; Fleming, Timothy <TFleming@willkie.com>; Liou, Jessica <jessica.liou@weil.com>; Slack, Richard <richard.slack@weil.com>
Subject: RE: PG&E Protective Order

Dan,

Thank you for the call earlier. The language you highlight was proposed by the TCC and accepted by the Debtors. We filed the redline in which the TCC proposed this language as Exhibit M to the Slack Declaration, ECF No. 2460-13, at 31 of 41. We do not believe the language shifts or otherwise addresses the burden of proof; it is merely intended to ensure that a party does not bring a frivolous motion to challenge a designation and has a good faith basis to bring such a challenge.

Please let us know if you'd like to discuss further.

Best,
Jay

<image001.jpg>

Jay Minga

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From: Forman, Daniel <DForman@willkie.com>

Sent: Friday, June 21, 2019 3:59 PM

To: Liou, Jessica <jessica.liou@weil.com>; Slack, Richard <richard.slack@weil.com>

Cc: Goren, Matthew <matthew.goren@weil.com>; McCallen, Benjamin <BMcCallen@willkie.com>;

Minga, Jay <Jay.Minga@weil.com>; Fleming, Timothy <TFleming@willkie.com>

Subject: RE: PG&E Protective Order

Thank you for the call. I wanted to follow up on one issue that is causing some confusion on my end. You mentioned that the dispute is not who bears the burden of persuasion on the appropriateness of a confidentiality designation once the dispute is brought to the Court's attention. And you believe the only dispute is over which party must bring the motion. You took the position on our call that your order is silent as to the burden of persuasion once the issue is before the court, but as drafted, the second-to-last sentence of section 6.3 of your draft could be read differently: "The Challenging Party may file a motion challenging a confidentiality designation at any time *if there is good cause for doing so*, including a challenge to the designation of a deposition transcript or any portion thereof." (emphasis added). This seems to tip the scales in the proceeding over the appropriateness of the designation. Rather than one question before the court (i.e. was the designation appropriate), the order could be read to add the question of whether the challenging party had good cause for filing their motion. Please let me know if I am misreading the order.

Thank you,

Dan

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From: Liou, Jessica [<mailto:jessica.liou@weil.com>]

Sent: Friday, June 21, 2019 12:15 PM

To: Slack, Richard <richard.slack@weil.com>; Forman, Daniel <DForman@willkie.com>

Cc: Goren, Matthew <matthew.goren@weil.com>; McCallen, Benjamin <BMcCallen@willkie.com>;

Minga, Jay <Jay.Minga@weil.com>

Subject: RE: PG&E Protective Order

Good here. Jay, would you send a planner with dial in?

Jessica

<image001.jpg>

Jessica Liou
Partner
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From: Slack, Richard <richard.slack@weil.com>
Sent: Friday, June 21, 2019 12:10 PM
To: Forman, Daniel <DForman@willkie.com>; Liou, Jessica <jessica.liou@weil.com>
Cc: Goren, Matthew <matthew.goren@weil.com>; McCallen, Benjamin <BMcCallen@willkie.com>;
Minga, Jay <Jay.Minga@weil.com>
Subject: RE: PG&E Protective Order

OK for me, if good with Jessica.

From: Forman, Daniel <DForman@willkie.com>
Sent: Friday, June 21, 2019 12:06 PM
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Cc: Goren, Matthew <matthew.goren@weil.com>; McCallen, Benjamin <BMcCallen@willkie.com>;
Slack, Richard <richard.slack@weil.com>; Minga, Jay <Jay.Minga@weil.com>
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Can we do 3 pm, if that still works for Ben too?

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On Jun 21, 2019, at 11:29 AM, Liou, Jessica <jessica.liou@weil.com> wrote:

Dan,

Happy to hop on a call. Are you available this afternoon after 1 pm et? I'm flexible.

Jessica

On Jun 21, 2019 10:17 AM, "Forman, Daniel" <DForman@willkie.com> wrote:

Jessica/Matt –

We're reaching out to see if we can resolve the piece of our objection does not overlap with the TCC's objection prior to the hearing next week. Please let us know if you're available to discuss.

Thanks,
Dan

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